UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE WINCHESTER DIVISION

GREGORY J. MORGAN)
Plaintiff,)
v.	Case No: 4:06-CV-15 JUDGE MATTICE/CARTER
COFFEE COUNTY, TENNESSEE;)
STEVE GRAVES, individually and in his official)
capacity; PAUL BLACKWELL, individually and)
in his official capacity; and, JONATHON YOTT) JURY DEMAND
individually and in his official capacity.)
Defendants)
Defendants.)

PLAINTIFF'S PRETRIAL DISCLOSURES

Comes now the Plaintiff Gregory J. Morgan, pursuant to Fed. R. Civ. P. 26(a)(3)(B) and(C) and discloses as follows:

I. <u>DEPOSITION TESTIMONY</u>

- A. Dr. James Thurman. Dr. Thurman's testimony will be present by videotape and transcript.
- B. Plaintiff Greg Morgan. In the event Mr. Morgan is unavailable, his testimony will be presented by the entire transcript of his deposition.
- C. Dr. David Florence. In the event Dr. Florence is not available, his testimony will be presented by pages 5, 6, 12, 15, 85-163 of his deposition.

II. EXHIBIT LIST

- 1. Inmate handbook.
- 2. November 8, 2004 Letter to Steve Graves from John Hanna.

- 3. TCI standards.
- 4. November 19, 2004 letter from Steve Graves to Jerry Abston.
- 5. November 19, 2003 Letter to Ray Johnson from Terry Hazard.
- 6. September 22, 2000 memorandum to Medical Staff.
- 7. September 23, 2004 TCI inspection report.
- 8. October 25, 2005 TCI inspection report.
- 9. June 5, 2006 TCI inspection report.
- 10. June 12, 2006 letter from Jerry Abston to Steve Graves.
- 11. August 7, 2006 TCI inspection report.
- 12. September 23, 2006 Letter from TCI.
- 13. November 8, 2004 letter from John Hanna.
- 14. August 13, 2003 TCI inspection report.
- 15. July 12, 2006 letter from Ray Johnson to Steve Graves.
- 16. Jail medical records.
- 17. T.C.A. §41-4-140
- 18. Invoice from Marvel Clinic.
- 19. Invoice Highland Rim Anesthesia.
- 20. Invoice Dr. Michael Shelton.
- 21. Invoice Dr. James Thurman.
- 22. Invoice Harton Regional Medical Center.
- 23. Medical records Harton Regional medical Center.
- 24. Medical Protocols.
- 25. Those exhibits identified by Defendants.

Respectfully Submitted,

Law Office of James Baum

/s/ James L. Baum James L. Baum (021818) P.O. Box 338 Burns, TN 37029 (615) 740-6899 Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was served on Jeffrey M. Beemer, Esquire, Stewart, Estes & Donnell, Financial Center Suite #1401, 424 Church Street, Nashville, TN 37219 by ordinary mail or electronic transmission on this the 22nd day of January, 2008.

/s/ James L. Baum James L. Baum